

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION**

SUSHMA JONES,

Plaintiff,

v.

THE DOW CHEMICAL COMPANY,

Defendant.

Case No. 1:23-cv-11814

Thomas L. Ludington
United States District Judge

Patricia T. Morris
United States Magistrate Judge

**ORDER GRANTING IN PART AND DENYING IN PART
PLAINTIFF'S MOTION TO COMPEL (ECF No. 12)**

Plaintiff filed a Motion to Compel the Depositions of Defendant's Corporate Designee Pursuant to Rule 30(b)(6) (ECF No. 12) and oral argument was held on April 17, 2024. For the reasons further stated on the record, and using ECF No. 12, Ex. F, PageID.101-106 for a statement of the numerated requests and responses, the motion is GRANTED IN PART AND DENIED IN PART as follows:

- Request 7 is DENIED.
- Requests 8 and 9 are GRANTED IN PART. The 30(b)(6) witness will provide information relevant to plaintiff's potential salary, wage rates, salary increases, bonuses, and other fringe benefits.
- Request 10 is GRANTED IN PART. The 30(b)(6) witness will testify as to onboarding training for employees holding LT-1 positions in the Michigan division plant where plaintiff was working.

- Request 11 is GRANTED IN PART. The 30(b)(6) witness will testify as to what the ethics complaint process entails and how supervisors are trained in the Michigan division plant where plaintiff worked. The request is limited to March of 2022 through July 2022.
- Requests 12-15 are GRANTED IN PART. The 30(b)(6) witness will testify as to topics regarding Michigan division plant supervisors in the plant where plaintiff worked from March 2020 through December 31, 2022.
- Request 16 is DENIED.

The depositions of Plaintiff and Defendant's 30(b)(6) witness will take place whenever the parties can get together regardless of order. The deposition of the Plaintiff will be taken in-person at a location to be determined by Plaintiff.

IT IS ORDERED.

Date: April 17, 2024

S/ PATRICIA T. MORRIS

Patricia T. Morris

United States Magistrate Judge